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**NEW YORK** 

MINNEAPOLIS

WASHINGTON, D.C.

July 29, 2025

Via ECF

Hon. Louis L. Stanton United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

RE: The City of New York v. Magellan Technology, et al., No. 23-5880-LLS-OTW

Dear Judge Stanton:

Pursuant to Individual Practice Rules 1.A and 1.E, and L.R. 7.1(d), Defendants Magellan Technology, Inc., Ectoworld, LLC d/b/a Demand Vape, and Matthew J. Glauser (collectively, "Defendants"), and Plaintiff the City of New York ("the City") in the above captioned matter respectfully submit this Letter Motion for a sixty-day extension of time to complete discovery from July 30, 2025 to September 29, 2025. This is the second request to extend time to complete discovery.

The parties have been actively engaged in discovery, including the exchange of discovery requests, document productions, and depositions. However, the parties will be unable to complete discovery by the current deadline of July 30, 2025. The parties believe an additional sixty days will provide adequate time to complete necessary discovery. Accordingly, the parties request the Court extend the deadline to complete fact discovery sixty days to September 29, 2025. Defendants have attached a proposed revised scheduling order to reflect the remaining case affected by the requested extension.

If the above is satisfactory to the Court, Defendants respectfully request that the requested extension of time to complete discovery be "So Ordered."

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Krupa A. Patel

Krupa Patel

Eric N. Heyer (admitted *pro hac vice*)
Joseph A. Smith (admitted *pro hac vice*)

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Counsel for Defendants Magellan Technology, Inc., Ecto World, LLC, and Matthew J. Glauser

## **MURIEL GOODE-TRUFANT**

Corporation Counsel of the City of New York Attorney for Plaintiff the City of New York 100 Church Street, Room 20-99 New York, NY 10007 (212) 356-2032

By: /s/ Eric Proshansky
Eric Proshansky
Elizabeth Slater
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Aatif Iqbal

Assistant Corporation Counsels



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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2025, I caused to be served on counsel of record, electronically via the ECF, a true and correct copy of the foregoing Joint Letter Motion.

s/ Krupa A. Patel
Krupa A. Patel

cc: All counsel of record (via ECF)